



## Comments for the

### March 2023 Census Scientific Advisory Committee Meeting

I submit these comments on behalf of the Coalition on Human Needs to the Census Scientific Advisory Committee meeting on March 9-10, 2023.

First, we want to thank the Bureau for deciding to delay the implementation of formal privacy in the American Community Survey (ACS), <https://www.census.gov/newsroom/blogs/random-samplings/2022/12/disclosure-avoidance-protections-acs.html>. We were very concerned that the application of formal privacy would significantly reduce the accuracy of data on race, ethnicity, and smaller age groups such as young children, particularly for substate geographic areas. We appreciate the Bureau's recognition that "the science does not yet exist to comprehensively implement a formally private solution for the ACS." We also applaud the recognition for the eventual plan to include data user review and feedback in the development of formal privacy for the ACS. We believe that the data user review and feedback process in formal privacy for the Decennial Census was very important in identifying the implications of implementing formal privacy for that data. We particularly want to note that, in addition to the problems created by formal privacy for data on children generally, Dr William O'Hare's research showed that differential privacy created significant concerns around accuracy when attempting to differentiate data by race and ethnicity in smaller geographic areas such as unified school districts. <https://countallkids.org/new-report-analysis-of-unified-school-districts-and-places-with-large-errors-for-the-population-ages-0-to-4-caused-by-application-of-differential-privacy/>

As the Bureau moves forward with its efforts to develop privacy protections for ACS data, we ask that it only consider methods that keep data on children and adults in the same household connected. We say this partly because we believe that this separation of children from adults created highly implausible results when DP was applied to the 2010 Census in a demonstration product. We also say this because we believe separating the data on children from the data on the adults in the household would make it impossible to produce meaningful child poverty data, since the measure of child poverty is the household income. Child poverty is the single most important indicator of child well-being. Even an approach to differential privacy that would cause a disruption in the historic trend lines on child poverty data would be very problematic. Such a separation would also make it very difficult to assess differences in family structures by race and ethnicity; those differences can be very important in developing state and local policy (for example, in creating supports for foster grandparents, or making sure zoning requirements permit family members to live together).

We also thank the Bureau for expanding the staffing resources for the Population Estimates unit. We believe the creation of the blended base has greatly increased the accuracy of data available on young children and we look forward to the analysis of whether it has improved the accuracy of data on undercounted groups such as Black and Hispanic men, once the modified race file is available later this spring. We believe that greater accuracy of the population estimates has important consequences including better targeting of federal funds to the communities and populations directed by Congress and better information for state and local governments.



We thank the Bureau for conducting its research on Census Barriers, Attitudes and Motivators early in the decennial cycle and repeatedly. This research is essential in developing effective strategies for counting everyone. We particularly ask that this research focus not just on getting everyone to respond to the Census, but also on how to get them to respond completely, including everyone living at that address. That means testing whether alternate terms for residences/households/mailling addresses are better, what descriptions of who should be counted are most effective in conveying who they are supposed to include, and what reasons for responding are most likely to produce complete responses. We ask that the Bureau specifically research whether families understand that they should include young children in their Census responses, what reasons lead them to leave young children off, and what messages make them more likely both to respond and to include young children when they respond. We also ask that the Bureau test what messages will persuade people that the response should include everyone at that address, with specific research on what messages encourage census respondents to include people who are not immediate family members (such as partners of family members or the children of partners), people who are only temporarily in the household but have no other residence (such as homeless families), people who split their time between two or more residences (such as people who may split their time between their partners' households and their birth families), children who live in the household but whose custodial parents live elsewhere, and other kinds of complex household situations.

We also ask the Bureau to research what messages will best convince people that their information will be kept confidential both from other government agencies and from private actors such as landlords. In that context, we recommend that the Bureau consider using the approach taken by NALEO in researching how people will respond about undocumented household members.

[https://naleo.org/COMMS/PRA/NEF%20Census%202020%20\\_2\\_10\\_FINAL.pdf](https://naleo.org/COMMS/PRA/NEF%20Census%202020%20_2_10_FINAL.pdf), starting on page 28.

Finally, we also suggest that the Bureau test its materials for stakeholders, intermediaries, and other key players such as landlords, to make sure the materials are clear about their legal obligations and persuasive about their motivations for supporting the census.

We ask the Bureau to provide an analysis of the 350 million write-in responses about racial and ethnic identity to the 2020 Census broken out by young children, and all children. (People could write in more than one racial and ethnic identity for each household member, which is why there were more write-in responses than people in the United States.) The Bureau produced an analysis of these write-in responses when it released redistricting data, but did not break it out by children or young children.

<https://www.census.gov/content/dam/Census/newsroom/press-kits/2021/redistricting/20210812-presentation-redistricting-jones.pdf> We know that children are more racially and ethnically diverse than the population as a whole, and young children are more racially and ethnically diverse than children as a whole. If the Bureau has produced such an analysis, we ask that it be made public; if it has not produced this analysis, we ask that it undertake it. Understanding how changes in the way data on race and ethnicity are collected and reported impact how people describe their young children will help users determine how much of the changes in race and ethnic distributions between 2010 and 2020 are the result of methodological changes.



We also ask the Bureau to release its report comparing a census conducted by administrative records with the 2020 census data, and we ask that such a report include specific analysis of whether the administrative data is better or worse for counting children, different racial groups, and different ethnic groups. As the Bureau considers significantly increasing its reliance on administrative data, this report will be invaluable for analyzing what the benefits and costs of such an approach might be. We are particularly concerned about the possible reliance on administrative data since some of the most reliable administrative data, such as tax records and benefits records, do not include race or ethnicity, and thus reliance on such records could result in much weaker reliability of such data.

We ask the Bureau to release its report on self-response rates by household characteristics, and we look forward to seeing what it says specifically about various racial and ethnic communities' self-response rates as well as households that include young children.

We thank the Bureau for its forthcoming report on how Census data is used to allocate federal funds, and we look forward to seeing what it specifically includes about funding for children's programs and programs of importance to people with low incomes.

Thank you for this opportunity to provide comments. Questions may be directed to Deborah Stein at [dstein@chn.org](mailto:dstein@chn.org).

Sincerely,

Deborah Stein, Senior Consultant